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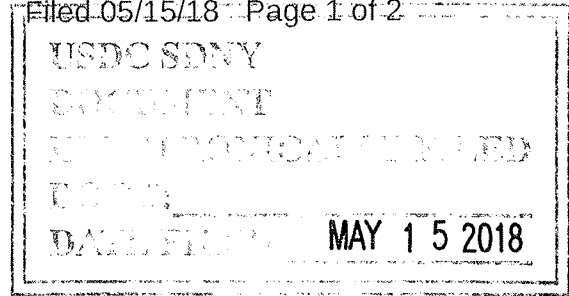
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May 15, 2018

VIA ECF

The Honorable Alison J. Nathan
 United States District Court
 Thurgood Marshall United States Courthouse
 40 Foley Square
 New York, NY 10007



Plaintiffs' counsel shall file any response to this letter by May 18, 2018. If no response is filed, the Court will conclude that there is no objection to the requirements proposed. If Plaintiffs' counsel objects to any of the stated requirements, they shall explain the disagreement and provide authority for their position. Any reply by the Defendant shall be due May 21, 2018. SO ORDERED.

Re: Julian et al. v. Metropolitan Life Insurance Co., No. 17-cv-00957 (AJN)

Dear Judge Nathan:

We write on behalf of Defendant Metropolitan Life Insurance Co. ("MetLife") regarding the Court's May 10, 2018 Order (ECF No. 67) (the "Order") in the above referenced matter. In the Order, the Court required Defendant to "disclose potential collective action members' contact information to both Plaintiffs' counsel and the third-party administrator." *Id.* at 2. MetLife intends to fully comply with the Court's Order. However, to protect the security of the potential collective action members' confidential personal data and contact information, MetLife respectfully requests that the Court provide some additional guidance as to the purposes for which such information may be used, and impose certain basic restrictions on Plaintiffs' counsel and any administrator concerning the use and storage of the personal data and contact information.

The personal contact information at issue is sensitive and private and, if it is not handled properly, could cause harm to the putative action members and result in further litigation. In that regard, the information that is provided should not be available to be used by Plaintiffs' counsel for any purpose other than to send the notice approved by the Court. If an individual who receives the notice chooses *not* to be a part of the action, which correspondingly means that they have *not* selected the Named Plaintiffs or their counsel to represent them, the contact information for such declining individuals should be destroyed and not used by Plaintiffs or their counsel for any other purpose. Indeed, contacting any individual who has chosen not to participate in the action would arguably be improper solicitation in violation of applicable ethical rules.

Accordingly, MetLife seeks an order requiring Plaintiffs' counsel to: (1) use the potential collective action members' contact information only for the purpose of sending notice in this action and then only through the means set forth in the Court's Order; (2) securely

SO ORDERED:

[Signature]
 HON. ALISON J. NATHAN
 UNITED STATES DISTRICT JUDGE

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store the potential collective action members' contact information and limit access to such information only to Plaintiffs' counsel and any administrator facilitating notice in this action; (3) return and subsequently destroy all copies (electronic or otherwise) of contact information received for any individual who does not opt-in to the collective action by the end of the opt-in period; and (4) keep all personal contact and other information (including any additional contact and personal information received from any participants) confidential at all times.

These basic requirements are necessary to ensure that potential collective action members' personal information is safely and securely stored and used only in an appropriate manner and for a limited purpose.

We have discussed this request in good faith with Plaintiffs' counsel in an effort to avoid the need for judicial intervention, but were not able to secure their consent and agreement to the protections requested as of the time of this submission.

We thank the Court for its consideration and continued assistance in this matter.

Respectfully submitted,

/s/ Melissa C. Rodriguez

Melissa C. Rodriguez

MCR